

UNITED STATES BANKRUPTCY COURT
DISTRICT OF NEW JERSEY

Caption in Compliance with D.N.J. LBR 9004-2(c)

LAW FIRM OF BRIAN W. HOFMEISTER, LLC

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Attorneys for Barry W. Frost, Chapter 7 Trustee

In Re:

BRICK DENTAL GROUP PROFESSIONAL CORP.

Case No.: 18-18328

Chapter 7

Judge: KCF

NOTICE OF MOTION SEEKING ENTRY OF AN ORDER: (A) APPROVING THE PRIVATE SALE OF THE DEBTOR'S DENTAL PRACTICE AND BUSINESS ASSETS FREE AND CLEAR OF ALL LIENS, CLAIMS AND ENCUMBRANCES; AND (B) VOIDING AN UNAUTHORIZED POST-PETITION SALE OF THE DEBTOR'S ASSETS

Martha Hildebrandt, Esq.
United States Trustee's Office
One Newark Center
Suite 2100
Newark, NJ 07102

John Michael McDonnell, Esq.
McDonnell Crowley
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Red Bank, NJ 07701

Brick Dental Group Professional Corp.
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Dental Recovery Solutions 360, LLC
Attn: James R. Chaffin, D.D.S.
8284 W. Union Hills Drive
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Internal Revenue Service
Attn: Special Procedures
955 South Springfield Ave.
Bldg. A., 3rd Floor
Springfield, NJ 07081

US Attorney General
970 Broad Street, Room 700
Newark, NJ 07102

Internal Revenue Service
2970 Market Street
Philadelphia, PA 19104-5016

State of New Jersey
Division of Taxation
Bankruptcy Section
50 Barrack Street, 1st Floor
Trenton, NJ 08646

State of New Jersey
Office of the Attorney General
Richard J. Hughes Justice Complex
8th Floor, West Wing
25 Market Street
Trenton, NJ 08625- 0080

PLEASE TAKE NOTICE that the undersigned, attorneys for Barry W. Frost, Chapter 7 Trustee for the Debtor Estate of Brick Dental Group Professional Corp. ("Trustee") herein, shall appear before the Honorable Kathryn C. Ferguson, Judge, United States Bankruptcy Court, 402 East State Street, Trenton, New Jersey, on the 12th day of June, 2018 at 11:00 in the forenoon, or as soon thereafter as counsel may be heard and shall apply for an Order: (A) Approving the Private Sale of the Debtor's Dental Practice and Business Assets Free and Clear of All Liens, Claims and Encumbrances and; (B) Voiding An Unauthorized Post-Petition Sale of the Debtor's Assets.

YOUR RIGHTS MAY BE AFFECTED. You should read these papers carefully and discuss them with your attorney, if you have one in this bankruptcy case. (If you do not have an attorney, you may wish to consult one).

PLEASE TAKE FURTHER NOTICE that, if you do not want the Court to enter an Order, or if you want the Court to consider your views on this Motion, then on or before June 5, 2018, you or your

attorney must:

File, with the Court, a written objection to this Motion, explaining your position to the Clerk, United States Bankruptcy Court, 402 East State Street, Trenton, New Jersey 08608;

If you mail your response to the Court for filing, you must mail it early enough so the Court will receive it on or before June 5, 2018. You must also serve a copy upon Brian W. Hofmeister, Esq., Law Firm of Brian W. Hofmeister, LLC, 3131 Princeton Pike, Building 5, Suite 110, Lawrenceville, New Jersey 08648; and

You must attend the hearing scheduled to be held on June 12, 2018 at 10:00 a.m. at 402 East State Street, Trenton, New Jersey.

PLEASE TAKE FURTHER NOTICE that if you or your attorney do not take these steps, the Court may decide that you do not oppose the relief sought in this Motion and may enter an order granting the relief requested.

PLEASE TAKE FURTHER NOTICE that the undersigned shall rely upon the annexed Application. In addition, if objections are submitted, the undersigned will be appearing for oral argument at the hearing.

PLEASE TAKE FURTHER NOTICE that the within Motion requests that the Court enter an Order: (A) Approving the Private Sale of the Debtor's Dental Practice and Business Assets Free and Clear of All Liens, Claims and Encumbrances and; (B) Voiding An Unauthorized Post-Petition Sale of the Debtor's Assets, and said Motion is based largely on the facts as outlined in the Application in support of the within Motion and the Application submitted herewith.

LAW FIRM OF BRIAN W. HOFMEISTER, LLC
Attorneys for Barry W. Frost, Chapter 7 Trustee for the Debtor
Estate of Brick Dental Group Professional Corp.

BY: /s/Brian W. Hofmeister
Brian W. Hofmeister

Dated: May 10, 2018